ATTACHMENT 8

INSPECTION PROGRAM PLAN

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CHEMICAL WASTE MANAGEMENT, INC.

LAKE CHARLES FACILITY

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INSPECTION PROGRAM PLAN

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INSPECTION PROGRAM PLAN

In accordance with the regulatory requirements set forth in the Louisiana Hazardous Waste Regulations (LAC 33V.1509), Chemical Waste Management, Inc. (CWM) has developed this Inspection Program Plan for its Lake Charles Facility located near Carlyss (Calcasieu Parish), Louisiana. The procedures set forth in this plan dictate that this facility will be in compliance with all requirements of the LHWR. A copy of this plan will be available at the facility at all times.

1.0 INTRODUCTION

This Inspection Program Plan is intended to provide a mechanism to prevent and detect system malfunctions, equipment deterioration and operator errors which if allowed to continue without remedial action, may ultimately lead to a release of hazardous waste constituents to the environment or create a threat to human health. The inspection program is designed to provide an early warning of the potential for such events in order that corrective and preventive actions may be taken in a timely manner.

The inspection program is divided into two segments: (1) general facility inspection, and (2) specific process unit inspections. The former focuses on items which apply to facility-wide operation. Site security, safety, emergency equipment, environmental monitoring systems and flood protection provisions are included under this category. Inspection of basic operation/utility systems -- such as the laboratory, truck scale, sampling station, truck washout facility, storage units and container decant systems -- are included in the second category. Specific treatment process units and bulk phase separation and container decant, are also included within the second category.

The inspection plan for the treatment and disposal units encompasses the process-specific monitoring and control systems and associated structures.

The inspection program is implemented by qualified individuals assigned the responsibility to detect any noncompliance conditions at the facility and prevent adverse consequences to human health and/or the environment. The designated individuals have the training and the authority to: (1) implement the required inspections, (2) perform the necessary evaluations and hazard assessments, and (3) recommend appropriate corrective or remedial actions.

Inspections are performed according to a pre-determined schedule based on regulatory requirements (where applicable), as well as engineering knowledge and operational experience with the systems and processes involved. Each inspection item has the content and frequency necessary to alert facility personnel prior to development of a serious problem. A trained inspector evaluates and assesses each

item indicating a potential malfunction, equipment deterioration or operator error through regular observation of the process and procedures. The level of response and its timing is determined by the nature and seriousness of the problem identified -- with protection of personnel and the prevention of adverse environmental impact being of paramount concern.

2.0 INSPECTION PROGRAM ADMINISTRATION

The Facility or General Manager or his designee (hereafter referred to as Facility Manager) is fully responsible for implementation and oversight of the Inspection Program. Generally, the inspection function operates independently of all other facility functions related to operations. The Environmental Manager, who works in conjunction with the Facility Manager, is designated with the staff responsibility for the inspections. Reports of the results of the inspections, with appropriate documentation, are made by the Environmental Technician or his alternate (hereafter referred to as inspector) directly to the Facility Manager. The Facility Manager is then responsible for directing the appropriate facility functional units to implement required remedial and corrective measures.

In some cases, specific inspection functions may be delegated to other facility functional units. For example, some inspections requiring mechanical aptitude, such as monthly checks of tank pressure relief devices, are more appropriately performed by Maintenance Department personnel as part of routine periodic maintenance. Also, given the importance placed on the role of the supervisor by Chemical Waste Management, unit supervisors may be delegated responsibility for performing periodic environmental and safety inspections. However, the responsibility for overseeing these inspections and assigning remedial action is always that of the Facility Manager or his designee.

2.1 Personnel Qualifications

Each inspector is trained in hazardous waste management, fundamentals of material hazards assessment, inspection and follow-up procedures, documentation and recordkeeping requirements, and various safety and contingency plan procedures.

2.2 Hazard Assessment and Evaluation Procedures

The inspector is familiar with the location of equipment and systems to be inspected and their normal configuration. For any discrepancy observed, the inspector determines the potential for personnel injury or for release of hazardous waste constituents, and he shall assess the nature and timing of remedial action required. His determination shall consider: (1) the location and nature of the problem, (2) the presence of secondary containment or

control, (3) the amount and type of waste material involved, (4) the potential for human exposure, and (5) the likelihood of waste migration.

The inspector shall maintain open lines of communication with the facility's Emergency Coordinator and with the Facility Manager. He must depend on their judgement and advice regarding physical constraints and scope of corrective actions, response timing, interim controls and counter-measures.

When an inspection indicates equipment malfunction or deterioration, or any other improper condition, at least the following actions are to be taken as appropriate:

- Assess the situation.
- For emergency or near-emergency situations, prompt verbal reports shall be made to the Facility Manager, to be followed later with written reports. For minor discrepancies, routine written reporting procedures, as discusses later, will be followed.
- Provide adequate follow-up to verify that the specified response has occurred and that the situation has been resolved satisfactorily.

In general, all remedial actions and re-inspections are expected to be completed within the week following the inspection which detected a problem. In specific cases where urgent action is required, appropriate coordination with cognizant facility personnel and frequent monitoring of the situation by the inspector will be continued until remedial actions are completed.

In cases where physical and/or operation constraints (e.g., replacement equipment availability) may require longer time frames to complete the problem correction, the inspection shall follow completion of the work.

2.3 Documentation and Recordkeeping

Inspections (and reinspection) are conducted and documented using forms specifically designed to contain all pertinent information. A specific Remedial Work Order and Reinspection Report (RWO) form is generated by the RCRA Site Inspector or his alternate for each discrepancy noted. For inspections delegated to facility unit personnel, discrepancies and associated corrective action are documented on the inspection form. When an inspection required by this plan reveals a discrepancy which cannot be corrected immediately (defined as during the same shift), a RCRA Site Inspector or his alternate is contacted to generate a Remedial Work Order. The RWO form denotes specific discrepancies and is forwarded to the appropriate personnel for

corrective action. Completed inspection forms are given to the Facility Manager who then signs the completed documents.

All completed forms and attachments are accumulated in the facility operation records. These are retained at the facility for a minimum period of three years from the date of inspection.

Separate inspection forms are provided for specified daily, weekly, monthly or other scheduled inspection. Each periodic inspection form (see figure 2-1 for an example) includes significant administrative information, such as the identification of the facility unit, the equipment item the inspection element, the name of the inspector, and the date and time of the inspection. The inspection checklist section of the form is for indicating the status of designated equipment or structures. Whether or not a designated piece of equipment or unit is in use, it is inspected routinely, and a notation of its operational status is made in the "observation" column, where applicable. The completed form is delivered to the Facility Manager's office for his review and signature. In some cases, when a particular unit is idled indefinitely, it may be deleted from routine checklists provided that it has been decontaminated and no longer manages hazardous waste. Proposed units will be added to the checklists prior to managing waste in those units.

The inspection report forms are prepared in advance to include pertinent items of equipment to be inspected according to specific schedules shown later in this plan. The referenced schedules represent minimum frequencies for inspection, and the actual inspection report forms may include more frequent inspections where it is justified by engineering judgement and operational experience. These forms will be periodically modified to accommodate changing needs of the facility.

A separate Remedial Work Order and Reinspection Report form (see Figure 2-2) is used for discrepancy identification and to document whether each discrepancy noted during an earlier inspection has been adequately corrected. This form identifies the equipment or process unit involved, the nature of the discrepancy noted, and the date of the inspection. It also describes response actions performed, the date that they were implemented, and the name of the person responsible for such actions.

The lower portion of this reinspection form is used by the inspector -- during his next scheduled inspection following the date in which the corrective work was completed -- to confirm that the corrective action has been made. When completed, the reinspection form is submitted to the Facility Manager's office for signature and subsequent filing with the facility's inspection log.

In summary, the inspection observes facility operations and equipment on a periodic basis in accordance with a specified schedule and inspection elements. When a significant discrepancy is noted, the inspector initiates a Remedial Work Order and Reinspection Report and corrective action is initiated.

In cases where specialized outside contractors may be used to perform testing or inspection services, the results are reported on the contractor's forms. These reports are made part of the inspection log when received.

3.0 GENERAL FACILITY INSPECTION

The general facility inspection activity encompasses the facility perimeter and those items within the property that are common (i.e. , not process-specific) to all operation. The general facility inspection activities encompass the following:

- Security Devices
- Environmental Monitoring Systems (including Flood Protection and Stormwater Containment Structures)
- Safety and Emergency Equipment

The general inspection schedules – including inspection parameters and frequency – are determined by regulatory requirements (where applicable) and the types of problems that can potentially occur.

3.1 Types of Potential Problems

The following considerations are pertinent to identification of the types of problems that may occur related to general facility operation:

- Breach of security, which may occur due to: (1) failure of the surveillance system, (2) damage to fences, natural barriers or entry control structures, or (3) obstruction, damage or loss of warning signs.

- Unplanned releases not detected by environmental monitoring equipment due to malfunction or failure. Such problems may occur due to failure of flood protection or other containment structures if these are not kept in good repair.

- Health and safety equipment failure, absence or inaccessibility.

3.2 General Inspection Schedules

The general inspection schedules are based on regulatory requirements (where applicable), the facility's operational mode, potential failure modes, and an assessment of the hazard magnitude posed by a particular malfunction, failure or discrepancy.

Schedules designed for inspection of Security Devices are shown in Table 3-1; for Environmental Monitoring Systems in Table 3-2; and for Safety and Emergency Equipment in Table 3-3.

4.0 PROCESS-SPECIFIC INSPECTION ACTIVITIES/SCHEDULES

The below listed operation unit and process systems at the facility are subject to process-specific inspection schedules and procedures presented in this section:

- Laboratory and Sampling Station
- Truck Scale, Receiving and Transportation Staging Areas
- Truck Washout Facility
- Container Management Area
- Storage and Treatment Tank Areas
- Container Decant/Filling/Processing Area
- Stabilization Unit
- Wastewater Treatment Pilot Plant
- Landfill

Equipment and structures at each process unit will be regularly inspected for malfunction, deterioration, failure, operator errors or other causes which could endanger human health or the environment. The types of potential problems and the hazards uniquely associated with each of the facility's process units are used to establish the elements (parameters) and frequency of inspection presented in the following sections.

4.1 Laboratory and Sampling Station Inspection

A principal source of concern in the facility's chemical laboratory is the potential for an inadvertent spill or release of hazardous waste constituents due to the improper handling, storage, or disposal of samples. Failure of the ventilation or hooding system, improper placement or storage of samples, and problems with sampling equipment also are inspection concerns. Pertinent inspection parameters and frequency of inspections for the on-site laboratory are shown in Table 4-1.

4.2 Truck Scale, Receiving, Transportation Staging Area Inspection

The major concern at the truck scale and receiving/staging areas is the cleanup of spills which may occur at these locations while waste loads are awaiting weighing, lab analyses, processing, or discrepancy resolution. The areas are inspected daily to check for the presence of spilled material and the removal of absorbent or clean up materials, where applicable. Pertinent inspection parameters and frequency of inspections for the Truck Scale Receiving/Staging Area are shown in Table 4-2.

4.3 Truck Washout Inspection

Release of hazardous waste constituents into the environment or risk to personnel safety could result for the following washout facility potential problems:

- Deterioration or failure of containment (beams, trenches, pad, below ground
- Overflow of in-ground tank

The inspection procedures and schedules for the truck washout are shown in Table 4-3.

4.4 Container Management Inspection

The potential problems of concern related to the facility's container (drum) storage building include:

- Spills in loading/unloading area
- Deteriorated, damaged, leaking or open containers
- Failure or deterioration of secondary spill containment structures
- Improper placement of incompatible materials

The elements and frequency of inspection for the container storage area are as shown in Table 4-4.

4.5 Tank Inspection

The types of potential problems which can occur at/near the Container Decant/Filling/processing, Bulk phase Separation and Storage Tank areas include:

- Spills during loading and unloading of tank
- Structural failure of tanks and secondary containment
- Ancillary equipment (i.e., pumps, valves) failure or malfunction

- VOC emissions from carbon adsorption units and pressure relief valves
- Leaks from pumps, pressure gauges, seals, ancillary equipment

The elements and frequency of inspection for the facility's bulk storage units are summarized in Table 4-5.

4.6 Container Decant/Filling/ Processing Area Inspection

Possible problems which may lead to release of waste constituents or affect human health and safety at the container decant system operation include:

- Malfunction of operating equipment such as pumps, pipes, or hoses.

The inspection procedures and appropriate schedules for the container decant process unit are shown in Table 4-6.

4.7 Stabilization Unit Inspection

Potential problems with the stabilization unit could result from structural or operation equipment failure, contamination tracking out of building, improper clean-up around mixing basins or particulate emissions.

The inspection procedures and appropriate schedule for the stabilization unit are shown in Table 4-7.

4.8 Wastewater Treatment Pilot Plant Inspection

The types or problems which could lead to a release of waste that could effect human health or the environment include:

- Spills during loading and unloading of tanks
- Structural failure of tanks or secondary containment
- Ancillary equipment (i.e., pumps, valves, piping) failure or malfunction

The elements and frequency of inspection for the Wastewater Treatment Pilot Plant are shown in Table 4-8

4.9 Landfill Inspection

The types of problems likely to increase potential for unplanned or unknowing release of hazardous wastes to the environment from active and closed landfill cells include:

- Run-on diversion berm failure or obstruction of drainage channels

- Run-off containment system failure
- Leachate generation and migration to ground or surface waters - due to liner failure or failure of the leachate removal systems.
- Wind dispersal of wastes
- Integrity of final cover of closed cells

Landfill inspection parameters and frequency are indicated in Table 4-9.

4.10 Containment Building Inspection

The potential problems of concern related to the facility's containment (container storage and/or waste pile) building (proposed as of the date of this revision) include:

- Deteriorated, damaged or leaking containers.
- Failure or deterioration of secondary spill containment structures.
- Improper placement of incompatible materials.
- Contamination tracking out of building.

The elements and frequency of inspection for the containment building are summarized in Table 4-10.

TABLE 3-1 GENERAL INSPECTION SCHEDULE, SECURITY DEVICES

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
SECURITY DEVICES		
Fence	· Inspect entire perimeter for breaches, damage	Quarterly
Gates	· Check for proper gate lock function	Weekly
Entrances	· Check for proper operation (guard, closed circuit TV, locked gate or controlled entry)	Daily
Warning Signs	· Check for presence of warning signs (perimeter and entrance)	Quarterly
Lighting System	· Check perimeter lights for operability	Weekly

TABLE 3-2 GENERAL INSPECTION SCHEDULE, ENVIRONMENTAL MONITORING SYSTEMS

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Groundwater Monitoring Network	· Check if wells are visible and accessible to personnel	Quarterly
	· Check for accidental damage to pipe/protective cover	Quarterly
	· Check for tampering or inadvertent opening of cap/lock	Quarterly
Surface Water Discharge Monitoring	· Check water surface for oil sheen; floating solids or visible foam in other than trace amounts	Daily
Air Sampler	· Check for operation, power on, chart paper	Daily
Meteorological Monitoring System	· Check for operation of vane and anemometer, recording equipment	Weekly
	· Check rain gauge for proper operation	Daily
Flood Protection	· Check structure for breaches, erosion, seepage of water	Monthly and after storms*
Drainage Channels	· Check for excessive erosion, vegetation growth or blockage	Monthly

*Defined as a two-inch rainfall during a 24-hour period as measured on-site.

TABLE 3-3 GENERAL INSPECTION SCHEDULE, SAFETY AND EMERGENCY EQUIPMENT

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Emergency Response Trailer	· Check access to trailer	Weekly
	· Check response equipment and supplies for condition (e.g., deterioration, cleanliness)	Monthly
First Aid Kits	· Check for access to and adequate supply in stationary units	Monthly
Safety Showers	· Check for proper operation	Monthly
	· Check for accessibility	Monthly
Alarm Systems	· Check accessibility	Daily
	· Activate audible alarm	Weekly
Internal (phone or radio)/External (phone) Communication System	· Check for proper operation	Weekly
Fire Extinguishers	· Check pressure gauge for full charge indication	Monthly
	· Check inspection tag to ensure annual maintenance is up-to-date	Monthly
	· Check seal to ensure no one has used extinguisher	Monthly
	· Check access to units in fire hazard areas	Monthly
Fire Blankets	· Check for deterioration	Monthly
	· Check for presence	Monthly
	· Check for accessibility (stationary units)	Monthly
Absorbent Supply	· Check for adequate supply	Weekly

TABLE 3-3 GENERAL INSPECTION SCHEDULE, SAFETY AND EMERGENCY EQUIPMENT (continued)

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Fire Truck	· Start engine and drive	Monthly
	· Operate pump	Monthly
	· Check for presence of hoses, nozzles, SCBAs, bunker gear	Monthly
	· Check for adequate foam supply	Monthly
Recovery Drums	· Check for adequate supply	Weekly
SCBAs	· Check pressure gauge, inspect tag, alarm bell, operability and condition	Monthly

TABLE 4-1 LABORATORY AND SAMPLING STATION INSPECTION SCHEDULE

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Sample Disposal System	• Observe if proper disposal procedures are in use	Weekly
Ventilation/Hood	• Check operability	Weekly
Sampling Equipment (Sampling Station)	• Check for proper placement of sampling equipment	Weekly
	• Check for the presence of spilled material	Weekly
	• Check for disposal of cleanup materials in proper container (if applicable)	Weekly
Site Generated Waste	• Check container labels	Weekly
	• Check for proper container closure and drainage	Weekly

TABLE 4-2 TRUCK SCALE, TRANSPORTATION STAGING AREA INSPECTION

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Truck Scales	· Check for the presence of spill material	Daily
	· Check for removal of absorbent or cleanup materials (if applicable)	Daily
Receiving and Transportation Staging Area (Roll-offs, Drums, and Tankers	· Check for damage to or leaks in transportation containers	Daily
	· Check for presence of spilled materials	Daily
	· Check for removal of used absorbent or cleanup materials (if applicable)	Daily
	· Check for proper container closure	Weekly
	· Check for proper aisle space (if applicable)	Weekly
	· Check liquid level in sumps	Weekly
	· Check for proper separation of incompatible waste	Weekly
	· Check for deterioration of containment systems	Weekly
	· Check for damage to grating over drains and sumps	Weekly
	· Check for transportation containers extending outside containment	Daily
	· Ensure all ignitable or reactives are at least 15 meters (50') from property line	Weekly
	· Ensure all loads are properly marked	Daily
Empty Roll-off Box Area	· Check for presence of spilled materials	Daily
	· Ensure containers are RCRA empty	Weekly

TABLE 4-2 TRUCK SCALE, TRANSPORTATION STAGING AREA INSPECTION (continued)

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Site Generated Waste	• Check container labels	Weekly
	• Check for proper container closure and drainage	Weekly

TABLE 4-3 TRUCK WASHOUT INSPECTION SCHEDULE

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Pad, Containment and Trenches (includes below ground tank)	· Check for deterioration of containment systems	Weekly
	· Check for damage to grating over drains and trenches	Weekly
	· Check for contamination tracking off of pad	Daily
	· Check in-ground tank freeboard	Daily
	· Inspect in-ground tank (T-102) interior for cracks, leaks, corrosion and erosion	Quarterly
	· Check for deterioration of concrete due to structural stress or chemical exposure	Quarterly
	· Check integrity of baffle walls	Quarterly
Site Generated Waste	· Check container labels	Weekly
	· Check for proper container closure and drainage	Weekly
Storage Tank* Containment Area	· Check for evidence of seepage outside of containment (e.g., wet spots or dead vegetation)	Daily
	· Check for presence of leaked material in containment area	Daily
Storage Tank	· Inspect tank exterior and ancillary equipment evidence of leaks, cracks, corrosion, or any other deterioration and check tank labels*	Daily
	· Inspect T-101 and T-102 interior for cracks, leaks, corrosion, and erosion	Annually

*For above ground tank only (T-101)

TABLE 4-4 CONTAINER STORAGE INSPECTION SCHEDULE

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Truck Loading/ Unloading Area (North Bays)	· Check for structural damage to or leaks in containers	Weekly
	· Check for leaked material on slab and ramps	Daily
	· Check for deterioration of containment system	Weekly
	· Check for removal of used absorbent or cleanup material (if applicable)	Daily
	· Check for damage to grating over sumps	Weekly
	· Check full containers awaiting transport to landfill for less than 90% filiage	Weekly
	· Check liquid level in sumps	Daily
	· Check containers awaiting transport to landfill for free standing liquids	Weekly
	· Check for proper container closure	Weekly
	· Check for transportation containers extending outside containment	Daily
Container Storage Areas	· Check for leaked material on slab and ramps	Daily
	· Check for removal of used absorbent or cleanup material (if applicable)	Daily
	· Check for deterioration of containment system	Weekly
	· Check for damage to grating over drains and sumps	Weekly
	· Check liquid level in sumps	Daily
Stored Containers	· Check for structural damage to or leaks in containers	Weekly

TABLE 4-4 CONTAINER STORAGE INSPECTION SCHEDULE (continued)

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
	• Check for proper container closure	Weekly
	• Check for proper separation of incompatible wastes	Weekly
	• Check for proper aisle space	Weekly
	• Check container labels	Weekly

TABLE 4-5 TANK INSPECTION SCHEDULE*

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Tank Truck Loading/ Unloading Area	· Check for presence of leaked material in unloading area	Daily
	· Check for deterioration of containment system	Weekly
	· Check for removal of used absorbent or cleanup material (if applicable)	Daily
	· Check for damage to grating over sump	Weekly
	· Inspect hoses/piping for deterioration or leakage	Daily
	· Check liquid level in sumps	Daily
	· Inspect hose couplings and valves for leakage	Daily
	· Check for transportation containers extending outside containment	Daily
Tank Containment Area	· Check for the presence of leaked material in containment area	Daily
	· Check for evidence of seepage outside containment (e.g., wet spots or dead vegetation)	Daily
	· Check for deterioration of containment system	Weekly
	· Check for damage to grating over sump (not applicable to T-501)	Weekly
	· Check liquid level in sump	Daily
	· Ensure containment drain valve is closed	Daily

*Includes Wastewater Holding Tank and Loading/Unloading Building and all Treatment and Storage Tanks in Drum and Bulk Processing Areas

TABLE 4-5 TANK INSPECTION SCHEDULE* (continued)

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Tanks	· Inspect tank exterior and ancillary equipment for evidence of leaks, corrosion or any other deterioration and check tank labels	Daily
	· Inspect T-501 interior for cracks, leaks, corrosion and erosion	Annually
	· Check waste feed cutoff systems for evidence that they are not in good working order	Daily
	· Inspect tank leak detection systems for evidence of leaks (except T-501)	Daily
	· Inspect tank pumps, pressure gauges, seals, and barrier fluid or leaks	Daily
	· Check carbon adsorption systems for VOC removal efficiency of 95%	Weekly
	· Monitor pumps to detect leaks	Monthly
	· Inspect pressure relief devices for leaks	Weekly
Site Generated Waste	· Check container labels	Weekly
	· Check for proper container closure and drainage	Weekly
	· Check drums for leakage and damage	Weekly
Wastewater Pipeline	· Inspect line for leaks or damage	Daily
	· Check for presence of protective barriers near roadway	Weekly

*Includes Wastewater Holding Tank and Loading/Unloading Building and all Treatment and Storage Tanks in Drum and Bulk Processing Areas

TABLE 4-5 TANK INSPECTION SCHEDULE* (continued)

The following inspections apply to equipment contacting or containing hazardous waste with organic concentrations of at least 10 percent by weight (fuels blending, when in operation):

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Pumps in Light Liquid Service	· Monitor for leaks	Monthly
	· Inspect visually for leaks	Weekly
Compressors	· Check sensor (w/o audible alarm) for failure of seal system or barrier fluid system	Daily
	· For compressors equipped with a sensor with an audible alarm, check alarm	Monthly
Pressure Relief Devices in Gas/Vapor Service	· Monitor for return to a condition of no detectable emissions	within 5 days of pressure release
Valves in Gas/Vapor or Light Liquid Service	· Monitor for leaks	Monthly
Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Flanges and other connectors	· Monitor potential leak discovered by another detection method (visual, olfactory, etc.)	within 5 days of leak discovery

*Includes Wastewater Holding Tank and Loading/Unloading Building and all Treatment and Storage Tanks in Drum and Bulk Processing Areas

TABLE 4-6 CONTAINER DECANT/FILLING/PROCESSING AREA INSPECTION SCHEDULE

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Truck Loading Area	· Check for leaks in containers	Weekly
	· Check for proper container closure	Weekly
	· Check for leaked material in unloading area	Daily
	· Check for deterioration of containment system	Weekly
	· Check for removal of used absorbent or cleanup material (if applicable)	Daily
	· Check for damage to grating over sump	Weekly
	· Check full containers awaiting transport to landfill for less than 90% fillage	Weekly
	· Check liquid level in sump	Daily
	· Check containers awaiting transport to landfill for free standing liquids	Weekly
	· Check empty containers awaiting transport to landfill for greater than 1" of residue	Weekly
	· Check for containers extending beyond containment	Daily
Container Handling and Staging Areas	· Check for structural damage to or leaks in containers	Weekly
	· Check for removal of used absorbent or cleanup materials (if applicable)	Daily
	· Check for proper container closure	Weekly
	· Check for proper separation of incompatible wastes	Weekly
	· Check for proper aisle space	Weekly

TABLE 4-6 CONTAINER DECANT/FILLING/PROCESS AREA INSPECTION SCHEDULE (continued)

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
	• Check container labels	Weekly
	• Check for liquid level in Decant Staging Area Sump	Daily
	• Check for damage to grating over sump	Weekly
	• Check for deterioration of containment system	Weekly
Decant Station	• Inspect hoses for deterioration or leakage	Daily
	• Check for removal of used absorbent or cleanup material (if applicable)	Daily
	• Check for deterioration of containment system	Weekly
	• Check for damage to grating over sump	Weekly
	• Check liquid level in sump	Daily
	• Inspect hose couplings and valves for leakage	Daily

TABLE 4-7 STABILIZATION UNIT INSPECTION SCHEDULE

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Stabilization	• Check for contaminants tracking out of building	Daily
	• Check for containment pad deterioration around mixing basins	Daily
Mixing Basins	• Check tank interior for damage or any other deterioration	Daily
	• Inspect tank interiors for cracks, leaks, corrosion and erosion	Daily
Mixing Basins Secondary Containment	• Check for evidence of seepage outside containment (e.g., wet spots or dead vegetation)	Daily
Scrubber Operation	• Check for proper operation of scrubber fans (i.e., no odors or particulates emanating from doorways)	Daily
	• Check for odor or particulates out of stack	Daily
	• Check for deterioration of containment system	Weekly
	• Check liquid level in sumps	Daily
	• Check for damage to grating over sump	Weekly
Site Generated Waste	• Check container labels	Weekly
	• Check for proper container closure and drainage	Weekly

TABLE 4-8 WASTEWATER TREATMENT PILOT PLANT INSPECTION SCHEDULE

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Tank Truck Loading/ Unloading Area	· Check for presence of leaked material in unloading area	Daily
	· Check for removal of used absorbent or cleanup material (if applicable)	Daily
	· Inspect hoses/piping for deterioration or leakage	Daily
	· Inspect hose couplings and valves for leakage	Daily
Tank Containment Area	· Check for presence of leaked material in containment area	Daily
	· Check for evidence of seepage outside containment (e.g., wet spots or dead vegetation)	Daily
	· Check for deterioration of containment system	Weekly
Tanks	· Inspect tank exterior and ancillary equipment for evidence of leaks, corrosion or any other deterioration and check tank labels	Daily
	· Check waste cutoff systems for evidence that they are not in good working order	Daily
Site Generated Waste	· Check container labels	Weekly
	· Check for proper container closure and drainage	Weekly

TABLE 4-9 LANDFILL INSPECTION SCHEDULE

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Run-on Diversion	· Check berms for significant erosion	Weekly and after storms*
	· Check channels for significant erosion or debris	Weekly and after storms*
Run-off Control System	· Check for erosion or deterioration of dikes (including seepage) and adequate height to prevent run-off	Weekly and after storms*
	· Check for leachate migration from active area to area under construction (if applicable)	Daily
Wind Dispersal Control	· Check for evidence of waste particulate dispersal	Daily
Inactive/Closed Cells	· Check for erosion, non-uniform subsidence, standing water, maintenance of grass cover, holes/cracks, rodent infestation, deep-rooted vegetation or shrubs	Monthly and after storms*
Primary Leachate Collection System	· Assure that leachate levels are being maintained at the required levels (except open modules)	Weekly
	· Check risers for damage, leaks, or evidence of submersion	Weekly
	· Check for proper function of leachate collection and removal systems	Weekly
Satellite Leachate Tank Containment Areas	· Check for the presence of leaked material in containment around tanks	Daily
	· Check for deterioration of containment system	Weekly
	· Check for evidence of seepage outside tank containment (e.g., wet spots of dead vegetation)	Weekly

TABLE 4-9 LANDFILL INSPECTION SCHEDULE (continued)

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Satellite Leachate Tanks	• Inspect tank exterior and ancillary equipment for evidence of cracks, leaks, corrosion or any other deterioration and check tank labels	Daily
	• Inspect tank detection systems for evidence of leaks	Daily
	• Check waste feed cutoff system for evidence that they are not in good working order	Daily
Leachate Piping	• Inspect for leaks or damage	Daily
	• Check for presence of protective barriers near roadways	Weekly
Secondary Leachate Collection System	• Assure that leachate levels are being maintained at the required levels	Weekly
	• Check risers for damage, leaks, or evidence of submersion	Weekly
	• Check for proper function of leachate collection and removal systems	Weekly
Pressure Relief System	• Check risers for damage, leaks or evidence of submersion	Weekly
Synthetic Liner (active cell)	• Check liner for rips, tears, etc.	Daily
	• Check for sharp objects on or near liner	Daily
Site Generated Waste	• Check container labels	Weekly
	• Check for proper container closure and drainage	Weekly

*Defined as a two-inch rainfall during a 24-hour period as measured on-site.

TABLE 4-10
CONTAINMENT BUILDING INSPECTION SCHEDULE

EQUIPMENT	INSPECTION ELEMENT/ TYPE OF PROBLEM	FREQUENCY OF INSPECTION
Containment Building	• Check for contaminants tracking out of building	Daily
	• Check for proper operation of emission controls (i.e., no odors or particulates emanating from doorways)	Daily
Container Storage Areas	• Check for leaked material on slabs and ramps	Daily
	• Check for removal of used absorbent material (if applicable)	Daily
	• Check to ensure storage of only solids	Weekly
	• Check for deterioration of containment system	Weekly
	• Check for damage to grating over sumps	Weekly
	• Check liquid level in sumps (if applicable)	Daily
	• Check container labels	Weekly
Bulk Solids (Waste Pile) Storage Areas	• Ensure waste does not exceed height of the containment wall	Daily
	• Ensure no liquids are present (i.e., due to precipitation, free liquids in waste)	Daily
	• Check for deterioration of containment system	Quarterly

ATTACHMENT 9

SECURITY PLAN

ATTACHMENT 9

SECURITY

ATTACHMENT 9

SECURITY

A. Security

Public ingress to an egress from the facility are controlled and on-site personnel are protected from health hazards by a personnel protection program.

B. Perimeter Control

The waste management area of the facility (160 acres, west side of John Brannon Road) is entirely fenced with a 6-foot high chain link fence to control access of people and wildlife onto the facility. This fence is shown in Attachment 9-A. It is patrolled daily to inspect its integrity.

C. Entry

The perimeter fence has four gates. Three of these gates are used only for access of construction equipment or for emergency evacuation. When opened and in use they are manned by security personnel to control ingress and egress. When not in use, they are closed and locked.

D. Perimeter Barrier

The active area of the facility is enclosed by a six foot high chainlink fence topped with three strands of barbed wire. This fence prevents entry of domestic livestock and prohibits unauthorized ingress or egress.

E. Perimeter Clear Zone

A clear path is maintained inside of the fence (on top of the perimeter levee). Lighting standards are installed along the entire fence line to light this path and the fence line.

F. Required Entry Facilities Include the Following:

A gate with locking devices are to be installed at the Main Gate. A guard house is located at the Main Gate and is manned by security personnel 24 hours per day. Floodlighting at the gate is installed and used to provide safety and security lighting at night.

The other three gates are equipped with locks and are lighted by the perimeter fences lighting system. Because these gates are used only for special construction activities and emergency evacuation, they do not have a guard house. However, a guard is posted at each of these gates when they are in use.

G. Emergency Response Facilities

1. Communications

An alarm system is installed to enable reporting of emergency events. Alarm activation panels are installed at 8 locations: the Bulk Unloading/Loading Unit, the Record Storage-001, Stab II-020, Fire Pump-031, Container Management Unit No. 1, the Decant and Filling Unit, the Stabilization I Unit (inside and outside), the Bulk

Aqueous-016 Loading/Unloading Unit, the Landfill. When activated, each panel sounds an alarm and reports the emergency to the guard house, thereby enabling the guard to report the emergency event to the Emergency Coordinator by phone, radio, or pager. Alarms panels will be installed in new units as they are constructed.

A telephone for communication with offsite persons in the vent of emergencies is installed at the guard house. Telephones are also installed in the Administration/Lab Building.

A two-radio system is installed and used for communication within the facility. Base stations are located at the guard house and Administration/Lab Building. Portable radios are carried by supervisory personnel and key personnel engaged in hazard-potential activity such as unloading wastes from trucks or working in the active areas (i.e., stabilization, landfill).

2. Fire Control

The Permittee must locate portable fire extinguishers, decontamination facilities, and fire control equipment at all facilities with potential fire hazard. Fire hydrants (with capacity as required by State Fire Code) will be located not more than 200 feet from each fire-hazard facility.

H. Moving Equipment Barriers

1. All tanks, pipelines, valves and other handling equipment are adequately protected from transportation accidents. All truck unloading/loading stations are equipped with appropriate posts, bumper guards or other barriers to prevent transportation accident.

2. Personnel protection barriers are placed around all high hazards locations.

I. Exterior Lighting

All regulated units, including their personnel barriers, shall be well lighted. All vehicle barriers are equipped with reflectors or painted with highly visible coatings.

The main gate shall be sufficiently lighted to ensure safety and security at night.

The perimeter fence shall be lighted.

J. Signs

Signs reading "DANGER-Hazardous Waste Area - Unauthorized Personnel Keep Out" shall be posted at the Main Gate and at intervals of less than 200 feet on the perimeter fence surrounding the property.